

C.S., ET AL v. CRAIG MCCRUMB, ET AL

DEPOSITION OF ADAM STROUB

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

C.S. by her Next Friend, ADAM STROUB,

Plaintiff,

v

File No.  
2:22-cv-10993-TGB-EAS

HON. TERRENCE G. BERG

CRAIG MCCRUMB, Individually and  
in his official capacity as Superintendent  
of Durand Area Schools, and AMY LEFFEL,  
Individually and in her official capacity  
as Principal of Robert Kerr Elementary School,  
and MICHAEL PAPANЕК, Individually and  
in his official capacity as On Track  
Coach of Robert Kerr Elementary,

Defendants.

/

DEPOSITION OF ADAM STROUB

Taken by the Defendants on the 1st day of December, 2022,  
at 432 North Saginaw Street, Flint, Michigan, at 10:00 a.m.

APPEARANCES:

For the Plaintiff:

MR. JOHN R. MONROE  
John Monroe Law, PC  
156 Robert Jones Road  
Dawsonville, Georgia 30534  
(678) 362-7650

For the Defendants:

MR. DANIEL J. LoBELLO, JR. (P81069)  
O'Neill Wallace & Doyle PC  
300 Saint Andrews Road, Suite 302  
Saginaw, Michigan 48638  
(989) 790-0960

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<p>1 Also Present: Craig McCrumb 2 C.S. 3 RECORDED BY: Lori Johnston, CER 15628 4 Certified Electronic Recorder 5 Network Reporting Corporation 6 Firm Registration Number 8151 7 1-800-632-2720 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 2</p>	<p>1 Flint, Michigan 2 Thursday, December 1, 2022 - 9:52 a.m. 3 REPORTER: Do you solemnly swear or affirm that 4 the testimony you are about to give will be the whole truth? 5 MR. STROUB: I do. 6 ADAM STROUB 7 having been called by the Defendants and sworn: 8 EXAMINATION 9 BY MR. LoBELLO: 10 Q Can you state your full name for the record, please? 11 A Adam Edward Stroub. 12 MR. LoBELLO: Let the record reflect that this is 13 the date and time scheduled for the deposition of Adam 14 Edward Stroub, being taken pursuant to Notice and to be used 15 for all purposes under the Federal Rules of Civil Procedure 16 and the Federal Rules of Evidence. 17 Q Mr. Stroub, my name is Dan LoBello. I'm here to ask you 18 some questions today about a lawsuit that you filed on 19 behalf of your daughter in connection with an incident that 20 occurred on February 17th of 2022. I take it that you 21 recall that incident? 22 A Yes. 23 Q Have you ever given a deposition before? 24 A No. 25 Q So we just have some court rule -- I'm sorry -- some rules</p> <p style="text-align: center;">Page 4</p>
<p>1 TABLE OF CONTENTS 2 PAGE 3 4 Examination by Mr. LoBello . . . . . 4 5 6 7 EXHIBIT INDEX 8 PAGE 9 Deposition Exhibit 1 marked . . . . . 11 10 (Durand Area Schools handbook) 11 Deposition Exhibit 2 marked . . . . . 13 12 (The RK Locomotion newsletter) 13 Deposition Exhibit 3 marked . . . . . 17 14 (Plaintiff's Answers to Interrogatories) 15 Deposition Exhibit 4 marked . . . . . 27 16 (Plaintiff's Complaint) 17 Deposition Exhibit 5 marked . . . . . 37 18 (Dress and grooming policy manual) 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 3</p>	<p>1 that are just kind of as a courtesy and mostly for the court 2 reporter's benefit so that when she's all done with our 3 recordings here today, she can type up an accurate 4 transcript. Okay? 5 A Okay. 6 Q One of those rules is that -- and you're doing a good job 7 now -- is to make sure that all of your answers are verbal. 8 It's natural to say "unh-unh" or "uh-huh" or shake your head 9 or whatever the case may be, but she can't take down that 10 stuff so it makes it a little difficult. 11 A Okay. 12 Q The next rule is that if you're answering my question, I'm 13 assuming that you understood my question. But we ask bad 14 questions all the time, I'm sure your counsel might have 15 told you. If you need me to rephrase or repeat something 16 because you don't understand it, I'm happy to do so. 17 Finally, if you need to take a break for whatever reason, I 18 have no problem with you taking a break. I would just ask 19 that if there's a question on the table that you answer the 20 question before we take a break. Okay? 21 A Okay. 22 Q All right. I have your current address as 5851 South Reed 23 Road in Durand, Michigan; is that still accurate? 24 A Correct. 25 Q And who do you live there with?</p> <p style="text-align: center;">Page 5</p>

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1 **A My fiancée and my daughter as well as my parents.**  
 2 Q And what is your fiancée's name?  
 3 **A Jessica Linfield, which is C.S.'s mother.**  
 4 Q Oh, and just for the record's purposes, I spoke with the  
 5 court reporter before we got started today. Any reference  
 6 to C.S. that we say as far as her full name is going to be  
 7 taken down as "C.S." so that her privacy is protected.  
 8 Okay?  
 9 **A Okay.**  
 10 Q You said it was your parents?  
 11 **A Yes.**  
 12 Q What are your parents' name?  
 13 **A William and Penny.**  
 14 Q Same last name as you?  
 15 **A Yes.**  
 16 Q And can you tell me about your education, starting with high  
 17 school?  
 18 **A I graduated from high school in '99, then I attended ITT**  
 19 **Tech and graduated there in 2008. Got a bachelor's degree**  
 20 **in graphic design.**  
 21 Q Any other formal schooling beyond ITT Tech?  
 22 **A No.**  
 23 Q Do you hold any licensing or certifications through the  
 24 state of Michigan?  
 25 **A CPL. I don't know if that counts.**

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1 Q Are you currently employed?  
 2 **A Self-employed.**  
 3 Q Do you own your own business?  
 4 **A Yeah, technically.**  
 5 Q Is it like a d/b/a or an LLC or incorporated or --  
 6 **A It's sole proprietor.**  
 7 Q And what is the nature of your business?  
 8 **A Exotic pets.**  
 9 Q Do you sell them or --  
 10 **A Yes.**  
 11 Q Okay. Is there any licensing that you need for selling  
 12 exotic pets?  
 13 **A Not at the amount we do. We don't sell that much yet, we**  
 14 **just started.**  
 15 Q Just out of curiosity, what kind of pets are we talking  
 16 about here?  
 17 **A Reptiles.**  
 18 Q How long as C.S. been enrolled with Durand Area Schools?  
 19 **A All of her school time. So since preschool.**  
 20 Q Does your daughter receive any type of special support  
 21 services through the school?  
 22 **A She has an IEP because of autism.**  
 23 Q When was she diagnosed with autism?  
 24 **A When she was 2, 3, something right in that area.**  
 25 Q Was that through the school or an independent --

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1 **A That was through a doctor in Flint. She had a seizure and**  
 2 **that wound us up in the hospital. And then through whatever**  
 3 **he seen there, he told us that our daughter was autistic.**  
 4 **And it was at that time that we started having her tested**  
 5 **and found out that he was right.**  
 6 Q Was any of the testing done through the school to determine  
 7 her autism diagnosis?  
 8 **A Not that I'm aware of, no. It's all been done through the**  
 9 **state.**  
 10 Q How long has she had an IEP?  
 11 **A Since she started school.**  
 12 Q And is there a particular area that she struggles with due  
 13 to her diagnosis?  
 14 **A Communication.**  
 15 Q Is she verbal, able to speak to communicate?  
 16 **A Yes.**  
 17 Q Okay. Any other manifestations of her disability for what  
 18 her IEP would cover?  
 19 **A She can get overwhelmed sometimes and it can cause her to**  
 20 **cry.**  
 21 Q Have you ever filed a due process complaint with the state  
 22 of Michigan with reference to your daughter's IEP?  
 23 **A I don't know what that is.**  
 24 Q So I take it that you haven't filed one then?  
 25 **A (No verbal response)**

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1 Q And I take it that you're on her IEP team?  
 2 **A Yes.**  
 3 Q Is your fiancée also on --  
 4 **A Yes.**  
 5 Q -- to IEP team? When was the most -- let me ask -- let me  
 6 back up. Before February 17th of 2022, when was the most  
 7 recent amendment or IEP meeting for C.S.?  
 8 **A I don't recall.**  
 9 Q Have you ever made any complaints or petitions to the school  
 10 with reference to your daughter's IEP?  
 11 **A No.**  
 12 Q Have you ever brought to the school's attention that you  
 13 felt that she was not receiving a free and appropriate  
 14 public education?  
 15 **A No.**  
 16 Q Have you ever attended a school board meeting since your  
 17 daughter's been enrolled?  
 18 **A Yes.**  
 19 Q And before the February 17th, 2022 incident, when was the  
 20 last board meeting that you attended?  
 21 **A I don't recall the exact day.**  
 22 Q Do you know if it was for the 2021/2022 school year?  
 23 **A I know I had been to a few of them, yeah.**  
 24 Q And did you have something to address with the board at that  
 25 meeting or you were just there to attend?

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3 (Pages 6 to 9)

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<p>1 <b>A Just there to attend for the most part, yeah.</b></p> <p>2 Q You said "for the most part," was there something that you</p> <p>3 addressed with the board at the meeting?</p> <p>4 <b>A They was talking about safety in schools and I was wondering</b></p> <p>5 <b>about them having an officer at school.</b></p> <p>6 Q I know that you said you can't recall when you went to the</p> <p>7 last board meeting before this incident that we're here to</p> <p>8 talk about. But at the board meetings that you attended,</p> <p>9 they were before the incident though; is that correct?</p> <p>10 <b>A Yes.</b></p> <p>11 Q Okay. Did you ever at any of those board meetings challenge</p> <p>12 the dress code or any other portion of the handbook?</p> <p>13 <b>A No.</b></p> <p>14 Q When your daughter was enrolled in third grade, which is I</p> <p>15 believe the grade that she was in at the time that this</p> <p>16 incident occurred, did you receive a handbook from the</p> <p>17 school?</p> <p>18 <b>A I don't recall for sure. I -- I think we did.</b></p> <p>19 Q I'm going to show you --</p> <p>20 <b>A But as I recall, it wasn't updated.</b></p> <p>21 Q And what do you mean by "it wasn't updated"?</p> <p>22 <b>A The -- the new principal's name wasn't on it, I don't think</b></p> <p>23 <b>if I remember right.</b></p> <p>24 Q The new principal as of the 2021 school year or the 2022</p> <p>25 school year?</p> <p style="text-align: center;">Page 10</p>	<p>1 <b>A Not specifically.</b></p> <p>2 Q With regard to communications from the school or school</p> <p>3 handbooks, things of that nature, are you primarily</p> <p>4 responsible for that or would your fiancée be responsible</p> <p>5 for that?</p> <p>6 <b>A She does the vast majority of the school stuff.</b></p> <p>7 Q Do you know whether or not she mentioned to you or otherwise</p> <p>8 indicated that she received, read the student handbook?</p> <p>9 <b>A She said that she received it, she never said anything about</b></p> <p>10 <b>actually reading it.</b></p> <p>11 Q And when you say she takes care of the school stuff, would</p> <p>12 you turn to the next page in Exhibit 1, there is -- I'll</p> <p>13 wait until you get there. Have you ever seen what's</p> <p>14 depicted on page 27 of Exhibit 1 before?</p> <p>15 (Witness reviews exhibit)</p> <p>16 <b>A No.</b></p> <p>17 Q You indicated that your fiancée handles most of the school</p> <p>18 stuff, do you know -- do you have any specific knowledge as</p> <p>19 to whether she would have viewed this page or filled it out</p> <p>20 or returned it to the school?</p> <p>21 <b>A I don't know.</b></p> <p>22 Q Does your daughter pick out her own clothes and dress</p> <p>23 herself every day or is that something typically your</p> <p>24 fiancée or you handle?</p> <p>25 <b>A She picks all her clothes.</b></p> <p style="text-align: center;">Page 12</p>
<p>1 <b>A 2022. I could be mixing them up.</b></p> <p>2 <b>(Deposition Exhibit 1 marked)</b></p> <p>3 Q I'm going to show what we'll have marked as Exhibit 1. And</p> <p>4 of course as we've talked about before you went on the</p> <p>5 record here today, this is the 2022/2023 school year</p> <p>6 handbook. If you could take a look at that handbook for me</p> <p>7 and let me know if there's anything that you see in that</p> <p>8 handbook compared to the handbook that you received in 2021</p> <p>9 that might be different or not updated to you?</p> <p>10 <b>A I wouldn't being able to tell you without seeing the other</b></p> <p>11 <b>handbook. I mean, obviously there's too much information to</b></p> <p>12 <b>know if anything's changed.</b></p> <p>13 Q Okay. With reference to the 2021/2022 handbook, did you</p> <p>14 read that handbook at all?</p> <p>15 <b>A No.</b></p> <p>16 Q And if you can turn to -- it would be page 26 of Exhibit 1.</p> <p>17 <b>A Okay.</b></p> <p>18 Q Looking at that page and with your knowledge of the 2021</p> <p>19 handbook, did you have a similar page, which I'll represent</p> <p>20 to you at the top says "Student handbook acknowledgment" --</p> <p>21 do you recall seeing any type of page like the one that you</p> <p>22 see in front of you?</p> <p>23 <b>A I don't recall, no.</b></p> <p>24 Q Do you recall signing or filling out any page that was</p> <p>25 similar to this for the 2021 handbook?</p> <p style="text-align: center;">Page 11</p>	<p>1 Q Now, leading up to February 17th of 2022 -- if I can find</p> <p>2 the page.</p> <p>3 (Deposition Exhibit 2 marked)</p> <p>4 Q I'm showing you what we'll have marked as Exhibit 2. And</p> <p>5 I'll represent to you that there's a few pages there, but if</p> <p>6 we need to refer to them, we'll say "2A, 2B, 2C," that sort</p> <p>7 of thing. Can you take a look at that document, or the</p> <p>8 documents that are included as Exhibit 2 for me?</p> <p>9 (Witness reviews exhibit)</p> <p>10 <b>A Okay.</b></p> <p>11 Q Have you ever seen any of the documents that are depicted in</p> <p>12 Exhibit 2?</p> <p>13 <b>A I've seen the first page here, yeah.</b></p> <p>14 Q Did you see it before or after February 17th of 2022?</p> <p>15 <b>A They handed them out, like, numerous times. So I can't be</b></p> <p>16 <b>for sure if it's this specific one or another one. But they</b></p> <p>17 <b>look pretty much the same from -- from week to week, month</b></p> <p>18 <b>to month.</b></p> <p>19 Q And when you say "they handed it out," is The RK</p> <p>20 Locomotion --</p> <p>21 <b>A Yes.</b></p> <p>22 Q -- a newsletter then?</p> <p>23 <b>A I guess you'd say a newsletter, information from the school,</b></p> <p>24 <b>yeah.</b></p> <p>25 Q Okay. With regard to this particular, we'll say, edition,</p> <p style="text-align: center;">Page 13</p>

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1 do you recall seeing the edition that's dated February 14th  
 2 through 18th, 2022?  
 3 **A No, not specifically.**  
 4 Q Do you have any specific recollection of seeing any  
 5 indication for an event called a "Great Kindness Challenge"?  
 6 **A I heard my fiancée speak about it.**  
 7 Q And when did you hear your fiancée speak about it?  
 8 **A I can't recall a day.**  
 9 Q Do you know if it was before or after the February 17th,  
 10 2022 event?  
 11 **A It would have been around that time, but I don't know if it**  
 12 **was before or after.**  
 13 Q What did she say to you about it, if anything?  
 14 **A Not much. I just kind heard it when she was talking to C.S.**  
 15 **about it.**  
 16 Q Did you ever ask about it or make any other inquiry with --  
 17 **A No.**  
 18 Q -- your fiancée? Before February 17th, 2022, did your  
 19 daughter, to your knowledge, have any type of disciplinary  
 20 issues at school?  
 21 **A No.**  
 22 Q How are your daughter's grades in terms of your knowledge of  
 23 her academics?  
 24 **A Pretty much a straight A student.**  
 25 Q Have you ever received any kind of negative report from the

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1 school concerning your daughter or areas where she needs to  
 2 improve, that kind of thing?  
 3 **A No, not negative reports.**  
 4 Q I know you said that you're self-employed. Do you go to a  
 5 location separate from your home to run your exotic pet  
 6 business?  
 7 **A No.**  
 8 Q Are you generally awake and -- generally awake in the  
 9 morning when your daughter gets ready for school?  
 10 **A Typically, no.**  
 11 Q Is that because a lot of the business is done at night or --  
 12 **A Yeah. I -- I do. Because it's hot, I do a lot of cleaning**  
 13 **of racks and stuff at nighttime.**  
 14 Q So then I take it your fiancée would be responsible for  
 15 getting her ready and getting her lunch and making sure that  
 16 she's getting to school on time?  
 17 **A Correct.**  
 18 Q Does C.S. take a bus or do you take her to school -- I'm  
 19 sorry. Does your wife -- fiancée take her to school?  
 20 **A No. She rides the bus. Well, no, we was taking her to**  
 21 **school for the third grade year, I believe. She didn't**  
 22 **start riding the bus this year -- until this year. So at**  
 23 **the time, we was taking her to school.**  
 24 Q I know you said you don't recall specifics concerning "The  
 25 Great Kindness Challenge." Did your fiancée or your

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1 daughter ever indicate to you that there were dress-up days  
 2 or events going on?  
 3 **A They held numerous dress-up days throughout the year, yeah.**  
 4 **Pajama day and other stuff.**  
 5 Q And with regard to Thursday, February 17th, did you give  
 6 your daughter anything for that particular dress-up day?  
 7 **A No.**  
 8 Q Okay.  
 9 **A I -- I didn't.**  
 10 Q Did your fiancée give her anything for the dress-up day?  
 11 **A C.S. had asked to wear my hat and she allowed her to wear**  
 12 **it, yeah.**  
 13 Q Is that the same hat you're wearing here today?  
 14 **A Correct.**  
 15 Q And that's your hat, that's not C.S.'s hat?  
 16 **A Yes, it's mine.**  
 17 Q On February 17th, 2022, were you ever contacted by the  
 18 school with regard to your daughter's hat?  
 19 **A Yes, they called.**  
 20 Q Do you know what time they called?  
 21 **A 9:30, 10:00 o'clock.**  
 22 Q Did you speak with the school or did your fiancée?  
 23 **A She answered the phone and then passed it off to me and I**  
 24 **spoke with Mr. Papanek.**  
 25 Q What was your conversation involving?

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1 **A That they was displeased with the hat and I -- first I**  
 2 **obviously didn't know what they was talking about, so I just**  
 3 **kind of asked my fiancée what was going on and then she told**  
 4 **me. And then I told her that, you know, she chose to wear**  
 5 **the hat and that she has the right to wear the hat and that**  
 6 **the hat's not hurting anybody. And I think that was about**  
 7 **it, something to that effect.**  
 8 Q Okay. And was that all the conversation or was there  
 9 anything else said?  
 10 **A I don't remember anything else.**  
 11 Q Do you remember if they asked if you could bring her a  
 12 different hat?  
 13 **A Yes. They did.**  
 14 Q And did you bring her a different hat?  
 15 **A No. That was the hat she picked she wanted to wear.**  
 16 Q Did she have other hats that she could have worn?  
 17 **A She did.**  
 18 Q All right. And did you have any other contact with the  
 19 school that day?  
 20 **A That day, yes. I emailed the principal.**  
 21 **(Deposition Exhibit 3 marked)**  
 22 Q I have here what we'll mark as Exhibit 3. And I'll  
 23 represent to you that these were the answers to our  
 24 interrogatories and discovery request that were provided to  
 25 us by your counsel. Can you look at those and just make

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5 (Pages 14 to 17)

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1 sure that those are as you understand them the answers that  
 2 you provided in connection with those requests?  
 3 (Witness reviews exhibit)  
 4 **A Yeah, it looks correct.**  
 5 Q Okay. I believe it's on the last two pages, but if you can  
 6 take a look at the last two pages, I believe, you may see  
 7 some what appear to be emails?  
 8 **A Okay.**  
 9 Q And do those appear to be the email communication that you  
 10 had with the principal at the time?  
 11 **A Yes. That is the email that I sent her after C.S. came home**  
 12 **from school.**  
 13 Q So after you spoke with Mr. Papanek, you did not have any  
 14 other email or phone conversation with anyone at the school  
 15 until your daughter already got home?  
 16 **A Correct.**  
 17 Q And why was it that you contacted them after your daughter  
 18 got home?  
 19 **A Because I asked her if they had made her take her hat off**  
 20 **after having the phone call with Mr. Papanek. And when she**  
 21 **said, "Yes," I emailed them just to confirm that it was,**  
 22 **yup, that they did that.**  
 23 Q Did your daughter come home with the hat?  
 24 **A She did.**  
 25 Q Did she receive any discipline because she wore the hat?

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1 **A She did not.**  
 2 Q Did she say anything else to you except that they made her  
 3 take off the hat?  
 4 **A That it upset her that she wasn't allowed to wear it.**  
 5 Q And did she say that, "I was upset because I wasn't allowed  
 6 to wear it," or did you read that from her demeanor?  
 7 **A She said it afterwards. On the day, I'm not sure.**  
 8 Q And why was it that she was upset?  
 9 **A Because they took her hat.**  
 10 Q No other reason?  
 11 **A No.**  
 12 Q After the incident, did you have any further contact with  
 13 the school either on the next day or the weeks the followed,  
 14 anything like that?  
 15 **A About the subject? No. I mean, we're in contact with the**  
 16 **school every day, our daughter goes there.**  
 17 Q And I asked a bad question. You filled in the blanks for  
 18 me. About the subject incident as far as the hat?  
 19 **A After the email, no.**  
 20 Q Did you ever raise the issue at a board meeting later on?  
 21 **A No, we did not.**  
 22 Q Has there been any other dress-up days where your daughter  
 23 was not allowed to wear whatever she had chosen for that  
 24 particular dress-up day?  
 25 **A Not that I'm aware of.**

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1 Q Before your daughter went to school on the date of this  
 2 incident, did you happen to review the handbook or do you  
 3 know if -- well, did you happen to review the handbook?  
 4 **A No.**  
 5 Q Okay. Do you know if your fiancée did?  
 6 **A No.**  
 7 Q So if we go back to Exhibit 1, which is the handbook, I  
 8 believe you'll find on page 15 there's a passage titled  
 9 "Proper clothing." I wonder if you can review that for me  
 10 really quick and let me know when you're done?  
 11 (Witness reviews exhibit)  
 12 **A Okay.**  
 13 Q Looking at the passage that you just read, I see a, we'll  
 14 say a bullet point or a dash, it says, "Hats, head scarves  
 15 are not worn by boys and girls during school hours except  
 16 for recess outdoors." Did I read that correctly?  
 17 **A Correct.**  
 18 Q So is it your understanding based on reading that passage  
 19 that your daughter wouldn't otherwise be able to wear a hat  
 20 to school unless it was for recess?  
 21 **A Or hat day, yeah, in which they encourage the use of hats.**  
 22 Q And that would be a school event, something sponsored by the  
 23 school?  
 24 **A Correct.**  
 25 Q If you turn to the next page, which is page 16 of Exhibit 1,

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1 there's a passage titled "Freedom of expression." Could you  
 2 read that for me and let me know when you're done?  
 3 (Witness reviews exhibit)  
 4 **A Okay.**  
 5 Q So within that passage -- and I'll just read a selection  
 6 from it. "All items must meet the following school  
 7 guidelines. Material cannot be displayed if it:" -- and you  
 8 go down to the bottom dash, it says "intends to incite  
 9 fighting or presents a likelihood of disrupting school or a  
 10 school event or a manner of distribution or display, it  
 11 causes or is likely to cause a material or substantial  
 12 disruption of school or school activities, a violation of  
 13 school regulations, or the commission of an unlawful act."  
 14 Did I read that correctly?  
 15 **A Yes.**  
 16 Q Looking at that passage and based on what I read, would you  
 17 agree that children who wear clothes to school that might  
 18 disrupt others' education should be prohibited?  
 19 MR. MONROE: I'll object to the extent it calls  
 20 for a legal conclusion. But answer if you can.  
 21 **A Okay. Can you repeat the question?**  
 22 Q Sure. Do you agree that clothing that would otherwise  
 23 disrupt another school student's learning or the learning  
 24 environment in general should be prohibited in school?  
 25 **A Yes, I think so.**

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6 (Pages 18 to 21)

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1 Q Okay. And in reading that passage, if the hat in question  
2 that your daughter wore were to disrupt the school in some  
3 way, would you agree that it should be prohibited?  
4 MR. MONROE: Same objection.  
5 **A No, I would not.**  
6 Q And why is that?  
7 **A Because the hat is not disturbing anybody.**  
8 Q And how do you know that?  
9 **A Because a hat can't disturb somebody. I -- I don't know --**  
10 **I don't know how to answer what you're asking.**  
11 Q Well, you said that you don't believe the hat could disturb  
12 anybody, but I'm just wondering how you came to that  
13 conclusion?  
14 **A Because it's a hat.**  
15 Q Going back to I believe we marked it as Exhibit 3, there are  
16 your Answers to Interrogatories. There are some pictures  
17 that are enclosed and it looks like it's the seventh page,  
18 starting there. I'm sorry. Yeah, the seventh page. It's  
19 this (indicating) one, just in case.  
20 (Witness reviews exhibit)  
21 **A Okay.**  
22 Q So these were some pictures -- and it looks like it's page  
23 7, 8, 9, 10, 11, 12, 13, 14, and 17. So it looks like from  
24 seven to 17, there's about 10 pages of photos that were  
25 produced with your Answers to Interrogatories. With regard

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1 to photo number seven, do you know who took that photo?  
2 **A It would have been my fiancée.**  
3 Q And when was it taken?  
4 **A I don't know.**  
5 Q Do you know who your fiancée took the photo? Would you say  
6 a camera or a camera phone or --  
7 **A With her phone, yeah.**  
8 Q Does she still have the same phone with this picture on it?  
9 **A I don't know if the picture's on there anymore, but she does**  
10 **have the phone.**  
11 Q Does it appear to be you and your daughter in the photo?  
12 **A Yes.**  
13 Q And do you have any independent recollection without looking  
14 at, say your wife's phone as to when this might have been  
15 taken, say years or months?  
16 **A No.**  
17 Q Seeing as there's not snow on the ground, would you venture  
18 a guess to say it's --  
19 **A It's summertime, yeah.**  
20 Q Summertime. Okay. And with respect to what's on page  
21 eight, that same photo, do you believe that's from the same  
22 day?  
23 **A Yes.**  
24 Q Also taken by your fiancée?  
25 **A Correct.**

Page 23

1 Q There's another photo, page nine, do you know who took that  
2 photo?  
3 **A I'm not sure who took that.**  
4 Q Was it you or your fiancée though?  
5 **A I don't know if it was her. I know it wasn't me because I'm**  
6 **in the picture.**  
7 Q You're the individual standing on what appears to be the  
8 left side of the photo, page nine?  
9 **A Correct.**  
10 Q And where is that photo taken?  
11 **A That was taken in front of the -- I'm drawing a blank. The**  
12 **capital, in Lansing.**  
13 Q Do you know when it was taken?  
14 **A That would have been the year before COVID, so I think '19.**  
15 Q Does the photo depict your daughter?  
16 **A It does.**  
17 Q And what were you guys doing at the capital that day?  
18 **A Second Amendment rights rally.**  
19 Q And is it through a group or a club that you belong to?  
20 **A I'm not sure who put it on.**  
21 Q Okay. Looking at page 10, does that appear to you to be the  
22 same day that are depicted in seven and eight?  
23 **A Yes. That was one day of us being out.**  
24 Q And where is this photo taken?  
25 **A Backyard of our house.**

Page 24

1 Q And it appears that your daughter is -- is that an actual  
2 firearm or is that like a BB gun?  
3 **A No. That is a .22.**  
4 Q Okay. Is that your .22 or her .22?  
5 **A That is my father's, her grandfather's .22.**  
6 Q Has your daughter taken any type of hunter safety or firearm  
7 safety courses?  
8 **A No.**  
9 Q Is she enrolled to take any type of firearm safety or hunter  
10 safety courses?  
11 **A Not yet, no.**  
12 Q And I know that you said it's the same day and it's summer.  
13 Was it this summer or was it last summer, summer before  
14 COVID?  
15 **A Either last summer or the summer before, I can't be sure.**  
16 Q And I take it that C.S. does not have actual ownership of  
17 any firearms of her own?  
18 **A No.**  
19 Q Turning to page 12, also on Exhibit 3. Can you tell me  
20 what's in Exhibit 3? I know it's probably at the capital  
21 like the other photo, but is that yourself, your daughter,  
22 and your fiancée?  
23 **A Correct.**  
24 Q And turning to page 16.  
25 **A Okay.**

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7 (Pages 22 to 25)



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<p>1 Q How did you come to receive this photo?</p> <p>2 <b>A It was, I believe, in a newspaper is I think where my</b></p> <p>3 <b>fiancee got it.</b></p> <p>4 Q And does it appear to you that the photo was taken Thursday,</p> <p>5 September 17th, 2020?</p> <p>6 <b>A Yeah.</b></p> <p>7 Q I know you said you weren't sure who put the Second</p> <p>8 Amendment rally on at the capital. Do you and your daughter</p> <p>9 belong to any other groups that support the Second Amendment</p> <p>10 or anything like that?</p> <p>11 <b>A No.</b></p> <p>12 Q Aside from the meeting at the capital, have you attended any</p> <p>13 other Second Amendment support rallies or meetings or</p> <p>14 anything like that?</p> <p>15 <b>A We go to the one at the capital every year, with the</b></p> <p>16 <b>exception of it being not available due to COVID.</b></p> <p>17 Q So they hold this rally annually in September?</p> <p>18 <b>A Yes. It's been going on for quite some time. I can't tell</b></p> <p>19 <b>you exactly how long.</b></p> <p>20 Q And do you know did the reporter who's named in the photo in</p> <p>21 Exhibit 16 (sic) take all the photos that appeared to depict</p> <p>22 either you or your daughter at the capital?</p> <p>23 <b>A I can't tell you if it's the same one or not.</b></p> <p>24 Q Did you go to the one this year? Or was there one this</p> <p>25 year, I should say?</p> <p style="text-align: center;">Page 26</p>	<p>1 <b>A No, I wouldn't.</b></p> <p>2 Q How would someone come to learn then or otherwise be able to</p> <p>3 recognize that "Come and take it" was associated with the</p> <p>4 right to keep and bear arms?</p> <p>5 <b>A History.</b></p> <p>6 Q So someone would have to learn history then?</p> <p>7 <b>A Yeah.</b></p> <p>8 Q And is it all history or a specific area of history?</p> <p>9 <b>A There's numerous days that's noted throughout it.</b></p> <p>10 Q Okay. Turning to the next paragraph, it looks like there's</p> <p>11 a citation to that Battle of Thermopylae in 480 BC. Looking</p> <p>12 at paragraph 21, in connection with paragraph 20, would you</p> <p>13 come -- or I guess, would you state that someone knowing of</p> <p>14 that battle would then know of that statement?</p> <p>15 <b>A I would sure hope so, yes.</b></p> <p>16 Q And even knowing about, we'll say the Battle of Thermopylae,</p> <p>17 how would a person or yourself associate that with the right</p> <p>18 to keep and bear arms?</p> <p>19 <b>A I'm not sure how to answer that. Can you repeat that</b></p> <p>20 <b>question?</b></p> <p>21 Q Sure. Looking at that statement and having somebody have</p> <p>22 knowledge of the Battle of Thermopylae and the statement</p> <p>23 "Come and take them," how would they associate that with the</p> <p>24 right to keep and bear arms?</p> <p>25 <b>A It's -- I'm -- I'm pretty sure that's what the battle was</b></p> <p style="text-align: center;">Page 28</p>
<p>1 <b>A We did.</b></p> <p>2 Q And did you have any photos from that event?</p> <p>3 <b>A We do.</b></p> <p>4 Q You took the photos or did somebody else?</p> <p>5 <b>A I took a few and so did my fiancée.</b></p> <p>6 MR. LoBELLO: Go ahead and mark this as Exhibit 4.</p> <p>7 (Deposition Exhibit 4 marked)</p> <p>8 Q And I'll represent to you this is a copy of the Complaint</p> <p>9 that was filed in this matter. Can you take a look at the</p> <p>10 Complaint and let me know when you're finished reading it?</p> <p>11 (Witness reviews exhibit)</p> <p>12 <b>A Okay.</b></p> <p>13 Q Looking at page four, I'm looking at paragraph 20</p> <p>14 specifically. And it says, "The words 'Come and take it'</p> <p>15 especially when used with the image of a star and some kind</p> <p>16 of weapon are a common slogan used to show support for the</p> <p>17 right to keep and bear arms." Do you have an idea as to the</p> <p>18 source of that statement or where it comes from?</p> <p>19 <b>A Yes. It's -- it's very -- it's a very old statement.</b></p> <p>20 Q Okay. And how is it common? I mean, I understand it might</p> <p>21 be common to you, but how is it common to somebody else?</p> <p>22 <b>A I would not be able to answer for somebody else.</b></p> <p>23 Q Would you agree that someone would have to have specific</p> <p>24 knowledge of that statement and its origin in order to know</p> <p>25 its meaning?</p> <p style="text-align: center;">Page 27</p>	<p>1 <b>about, about them having their right to bear arms.</b></p> <p>2 Q But I'm wondering how, in your eyes, somebody would relate</p> <p>3 those two things?</p> <p>4 <b>A Relate what two things?</b></p> <p>5 Q The statement "Come and take them" with the right to keep</p> <p>6 and bear arms based on their knowledge of the Battle of</p> <p>7 Thermopylae?</p> <p>8 <b>A Because they wasn't willing to lay down their weapons.</b></p> <p>9 Q Okay. And someone could have a different interpretation of</p> <p>10 the purpose of that battle; right?</p> <p>11 <b>A Sure.</b></p> <p>12 Q And going to paragraph 22, it seems like 22 and 21 are</p> <p>13 somewhat connected. You've got the Battle of Thermopylae,</p> <p>14 Spartans, Greek, and then you've got a Greek phrase there</p> <p>15 "Molon labe"; right?</p> <p>16 <b>A Correct.</b></p> <p>17 Q Someone not knowing or having any context as far as the</p> <p>18 history, do you expect that they would be able to understand</p> <p>19 "Molon labe"?</p> <p>20 <b>A I can't answer for what someone else would understand.</b></p> <p>21 Q Okay. How about 24? "Used by American Colonel John</p> <p>22 McIntosh in November 25th, 1778, was defending Fort Morris,</p> <p>23 Georgia against a British attack in response to a British</p> <p>24 demand for a surrender of a fort. The British declined to</p> <p>25 attempt to do so." Would someone have to know of this</p> <p style="text-align: center;">Page 29</p>

8 (Pages 26 to 29)



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<p>1 battle in order to associate that battle with the phrase</p> <p>2 "Come and take it"?</p> <p>3 <b>A Yes. I would assume so.</b></p> <p>4 Q And do you believe that it's common for people to be aware</p> <p>5 or know of this battle?</p> <p>6 <b>A It's taught in public schools, so I would assume so, I</b></p> <p>7 <b>guess.</b></p> <p>8 Q Does your daughter have a history book or something that</p> <p>9 would cite to this battle?</p> <p>10 <b>A No.</b></p> <p>11 Q When you say "it's taught in public schools," how do you</p> <p>12 know?</p> <p>13 <b>A Because I went to public school.</b></p> <p>14 Q And it was in your books then?</p> <p>15 <b>A Correct.</b></p> <p>16 Q And this phrase "Come and take it" was something that was</p> <p>17 specifically identified when you were learning about the</p> <p>18 battle on November 25th of 1778?</p> <p>19 <b>A I mean, I don't have specific recollection of that, but yes.</b></p> <p>20 Q 25, it says, "The Texans created the Gonzales flag. But</p> <p>21 during the Texas Revolution after Mexico demanded that Texas</p> <p>22 return a small cannon that Mexico had previously supplied to</p> <p>23 the county of Gonzales for its defense." Now, I take it</p> <p>24 you're associated that or you're asserting that to allege</p> <p>25 that that's the same white star that appeared on the hat</p> <p style="text-align: center;">Page 30</p>	<p>1 Q It's on page five of the Complaint.</p> <p>2 <b>A Okay.</b></p> <p>3 Q It's paragraph 28.</p> <p>4 <b>A I was actually not aware of that, that one's new to me.</b></p> <p>5 Q Do you have any background in the United States Military?</p> <p>6 <b>A No.</b></p> <p>7 Q Does your fiancée have any background in the United States</p> <p>8 Military?</p> <p>9 <b>A Her father spent the majority of his life in the military.</b></p> <p>10 Q Her father, is he still living?</p> <p>11 <b>A Yes.</b></p> <p>12 Q And for the record, he is not the one living with you,</p> <p>13 that's your parents; right?</p> <p>14 <b>A Yes; correct.</b></p> <p>15 Q And what branch of the Armed Forces was he in? I'm sorry.</p> <p>16 <b>A I'm not sure.</b></p> <p>17 Q What about your father or your mother, were they in the</p> <p>18 Armed Forces at all?</p> <p>19 <b>A No.</b></p> <p>20 Q Okay. In number 29, it says, "C.S. understands the meaning</p> <p>21 of the inscription on the hat and the importance of the</p> <p>22 inscription to support" -- "to the support of the right to</p> <p>23 keep and bear arms." How do you know that your daughter</p> <p>24 understands?</p> <p>25 <b>A Because her mother and I have taught her.</b></p> <p style="text-align: center;">Page 32</p>
<p>1 that your daughter wore to school on February 17th, 2022?</p> <p>2 <b>A Yes. The Texas Lone Star.</b></p> <p>3 Q And looking at the hat and looking at this paragraph, how</p> <p>4 would someone recognize that that is the Texas Star, as</p> <p>5 opposed to any other star?</p> <p>6 <b>A Because it's tradition with the -- with the single star in</b></p> <p>7 <b>conjunction with any sort of a weapon that it would be the</b></p> <p>8 <b>Texas Lone Star.</b></p> <p>9 Q And I appreciate that. How would somebody know that?</p> <p>10 <b>A Again, I can't speak for what someone else would know.</b></p> <p>11 Q Okay. Is it different, say, than the stars that are on the</p> <p>12 American flag?</p> <p>13 <b>A Yes.</b></p> <p>14 Q And how would someone be able to differentiate between the</p> <p>15 two?</p> <p>16 <b>A I -- I can't tell you what -- how someone could do that.</b></p> <p>17 Q Would you agree that somebody would have to have specific</p> <p>18 knowledge of this battle or the history behind it in order</p> <p>19 to be able to identify that star as opposed to any other</p> <p>20 white star that they see?</p> <p>21 <b>A Possibly, yeah.</b></p> <p>22 Q Number 28, it says, "The words 'Molon labe' are a motto of</p> <p>23 the United Special Operations Command Central." How do you</p> <p>24 know that?</p> <p>25 <b>A I'm sorry. What page are you on?</b></p> <p style="text-align: center;">Page 31</p>	<p>1 Q And would you agree that your teaching of her gives her a</p> <p>2 specific knowledge as to what the "right to keep and bear</p> <p>3 arms" means?</p> <p>4 <b>A Yes.</b></p> <p>5 Q Would you agree that somebody would have to have a</p> <p>6 background or some information about the right to keep and</p> <p>7 bear arms in order to be able to identify, say, the Texas</p> <p>8 Star or the phrase "Come and take it"?</p> <p>9 <b>A I'm not sure.</b></p> <p>10 Q Is there anything on the hat that your daughter was wearing</p> <p>11 that says that she supports the right to keep and bear arms?</p> <p>12 <b>A Just the -- the hat and the slogan itself would tell most</b></p> <p>13 <b>people that.</b></p> <p>14 Q And I'll clarify because that was a bad question. Is Second</p> <p>15 Amendment or "keep and bear arms" or anything referencing</p> <p>16 Article Two of the Constitution on the hat itself?</p> <p>17 <b>A No.</b></p> <p>18 Q And would you agree with me that people could have</p> <p>19 interpretations of the hat?</p> <p>20 <b>A I -- I wouldn't think so, no.</b></p> <p>21 Q How is that?</p> <p>22 <b>A I mean, it's -- just seems to me like it's common knowledge</b></p> <p>23 <b>what that would mean.</b></p> <p>24 Q I know it seems to you like it's common knowledge because</p> <p>25 you have some history and background it seems. But I'm</p> <p style="text-align: center;">Page 33</p>

9 (Pages 30 to 33)

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<p>1 saying how is that you know somebody couldn't interpret the</p> <p>2 hat differently?</p> <p>3 <b>A I don't.</b></p> <p>4 Q Looking at paragraphs, we'll say 20 through 28, would you</p> <p>5 agree with me that as you've described the phrase "Come and</p> <p>6 take it," the Texas Star, the phrase "Molon labe," that</p> <p>7 these are statements or representations in general of</p> <p>8 battles or war or similar events?</p> <p>9 <b>A Typically, yes.</b></p> <p>10 Q Okay. And would it be your understanding that war would</p> <p>11 typically involve violence?</p> <p>12 <b>A Yes.</b></p> <p>13 Q And would you agree that the student handbook precludes a</p> <p>14 student from wearing banners or insignias that are violent</p> <p>15 themes?</p> <p>16 <b>A Yes.</b></p> <p>17 Q Okay. And is that something you were able gleam just by</p> <p>18 reading the handbook that we did today?</p> <p>19 <b>A Yeah.</b></p> <p>20 Q Would you agree with me that if you were to read the</p> <p>21 handbook prior to her wearing the hat and going to school</p> <p>22 that day, that you may have found that it might not be in</p> <p>23 line with the dress code policy?</p> <p>24 <b>A No.</b></p> <p>25 Q And how is that?</p> <p style="text-align: center;">Page 34</p>	<p>1 Q Did you purchase the shirts or does she own the shirts to</p> <p>2 wear at a time when she's outside the school?</p> <p>3 <b>A No. We can't afford to wear shirts that she can't wear</b></p> <p>4 <b>daily -- or to purchase shirts that she can't wear daily.</b></p> <p>5 <b>Sorry.</b></p> <p>6 Q Does she ever ask to wear, say, your shirt or a sweatshirt?</p> <p>7 <b>A No. My clothes won't fit her.</b></p> <p>8 Q Aside from the rallies, I know you said that your daughter</p> <p>9 doesn't participate in any type of Second Amendment groups,</p> <p>10 is there anything else that she does that would indicate to</p> <p>11 somebody else that she supports the Second Amendment?</p> <p>12 <b>A Not to somebody else. Her and I do some shooting, as you've</b></p> <p>13 <b>seen.</b></p> <p>14 Q Has she ever written papers on the Second Amendment or --</p> <p>15 <b>A No.</b></p> <p>16 Q -- any of the historical depictions or cites that you've</p> <p>17 made in your Complaint?</p> <p>18 <b>A No.</b></p> <p>19 Q Has she ever tried to use the Second Amendment as a theme</p> <p>20 for an assignment for school?</p> <p>21 <b>A I'm not sure. I don't think so.</b></p> <p>22 Q The clothing that you said that you didn't purchase for her</p> <p>23 because you were worried it wouldn't be approved by school,</p> <p>24 can you state specifically what was on the shirt?</p> <p>25 <b>A No, not specifically.</b></p> <p style="text-align: center;">Page 36</p>
<p>1 <b>A Because I don't see the hat as a violent theme.</b></p> <p>2 Q And I understand that you don't see the hat as a violent</p> <p>3 theme, but based on what the school has said and based on</p> <p>4 your understanding, did you seek to clarify that with the</p> <p>5 school as to whether your understanding and the school's</p> <p>6 understandings matched up?</p> <p>7 <b>A No.</b></p> <p>8 Q Did your daughter make any statements, aside from selecting</p> <p>9 the hat on the day in question, to you except that she</p> <p>10 wanted to wear the hat?</p> <p>11 <b>A I was not up when she left for school that morning.</b></p> <p>12 Q That would be something she would have addressed with your</p> <p>13 fiancée?</p> <p>14 <b>A Correct.</b></p> <p>15 Q And has your daughter tried to wear any other clothing or</p> <p>16 insignia that you understand to be her wanting to support</p> <p>17 the Second Amendment on any other day?</p> <p>18 <b>A She has asked for -- for stuff, but we generally don't have</b></p> <p>19 <b>it because of this.</b></p> <p>20 Q When you say "she's asked for stuff," what do you mean?</p> <p>21 <b>A She's asked for certain shirts and stuff that we've told her</b></p> <p>22 <b>that we don't think that the school would allow it because</b></p> <p>23 <b>of what's already happened.</b></p> <p>24 Q Can you be more specific in terms of "certain shirts"?</p> <p>25 <b>A Second Amendment style shirts.</b></p> <p style="text-align: center;">Page 35</p>	<p>1 MR. LoBELLO: I think I'm close to being done. I</p> <p>2 just want to confer with my client quickly. And we can take</p> <p>3 a short break then we can almost be done.</p> <p>4 MR. MONROE: Okay.</p> <p>5 (Off the record)</p> <p>6 (Deposition Exhibit 5 marked)</p> <p>7 Q Mr. Stroub, I'm going to hand you two sheets of paper and</p> <p>8 we'll mark these -- I think we're on Exhibit 5. If you</p> <p>9 could take a look at those two sheets of paper and let me</p> <p>10 know when you're done?</p> <p>11 (Witness reviews exhibit)</p> <p>12 <b>A Okay.</b></p> <p>13 Q Have you ever seen either of the two sheets of paper for the</p> <p>14 information contained on Exhibit 5?</p> <p>15 <b>A No.</b></p> <p>16 Q Since the event involving your daughter on February 17th,</p> <p>17 have you attended any board meetings in attempt to make a</p> <p>18 change or modify the dress code policy in any way?</p> <p>19 <b>A No.</b></p> <p>20 Q Do you have any independent knowledge of the school</p> <p>21 enforcing the dress code, say, unevenly where your daughter</p> <p>22 was not able to wear a hat but somebody else was able to</p> <p>23 wear --</p> <p>24 <b>A No.</b></p> <p>25 MR. LoBELLO: Mr. Stroub, I believe that's all I</p> <p style="text-align: center;">Page 37</p>

10 (Pages 34 to 37)

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1 have for you. Your counsel may have some questions for you.  
2 Thank you very much for your time today.  
3 MR. MONROE: I don't have any questions.  
4 (Deposition concluded at 10:54 a.m.)  
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<b>A</b>	<b>appear</b> 18:7,9 23:11 24:21 26:4	<b>Backyard</b> 24:25	<b>call</b> 18:20	33:22,24
<b>a.m</b> 1:17 4:2 38:4	<b>APPEARANCES</b>	<b>bad</b> 5:13 19:17	<b>called</b> 4:7 14:5	<b>communicate</b> 8:15
<b>able</b> 8:15 11:10	1:19	33:14	16:19,20	<b>communication</b>
20:19 27:22 28:2	<b>appeared</b> 26:21	<b>banners</b> 34:14	<b>calls</b> 21:19	8:14 18:9
29:18 31:14,19	30:25	<b>based</b> 20:18 21:16	<b>camera</b> 23:6,6	<b>communications</b>
33:7 34:17 37:22	<b>appears</b> 24:7 25:1	29:6 35:3,3	<b>cannon</b> 30:22	12:2
37:22	<b>appreciate</b> 31:9	<b>battle</b> 28:11,14,16	<b>capacity</b> 1:8,9,11	<b>compared</b> 11:8
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